**U.S. ENVIRONMENTAL PROTECTION AGENCY**
**POLLUTION/SITUATION REPORT**
**Pillsbury Mills Site - Removal Final POLREP**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**
**Region V**

**Subject:** **Final POLREP #7**
**Pillsbury Mills Site – Asbestos Removal**
**Springfield, IL, Sangamon County Illinois**
**North Latitude:** 39.8113590 **West Longitude:** -89.6321720

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**From:** Kevin Turner, On-Scene Coordinator
**Date:** 12/8/2017
**Reporting Period:** 9/19/2017 – 12/8/2017

## 1. Introduction

### 1.1 Background

| | | | |
|---|---|---|---|
| **Site Number:** | C5BW | **Contract Number:** | |
| **D.O. Number:** | | **AM Date:** | November 7, 2016 |
| **Response Authority:** | CERCLA/NCP | **Response Type:** | Time Critical |
| **Response Lead:** | USEPA | **Incident Category:** | Removal Action |
| **NPL Status:** | Non NPL | **Operable Unit:** | |
| **Mobilization Date:** | February 6, 2017 | **Start Date:** | February 6, 2017 |
| **Demob Date:** | September 21, 2017 | **Completion Date:** | November 1, 2017 |
| **CERCLIS ID:** | ILD005172622 | **RCRIS ID:** | |
| **ERNS No.:** | | **State Notification:** | |
| **FPN#:** | | **Reimbursable Account #:** | |

**1.1.1 Incident Category**
Time critical removal and disposal action of friable asbestos contaminated debris (ACM) from prior improper abatement and building demolition actions taken by others. The Site was contaminated by asbestos resulting from demolition of Site buildings containing asbestos and the scrapping of metal pipes.

**1.1.2 Site Description**
The Site is a former grain/flour processing plant with an 18.82 acre triangular parcel (20.90 acres including right-of-way). Most of the original surface coverage consisted of the grain elevators, the front office, and the facility's main industrial complex, including the mill buildings, the manufacturing areas, the many warehouses, employee parking areas and the railroad spurs which previously delivered un-milled grain and finished flour products.

The remaining buildings are predominately contiguous throughout the first and second floors and have multiple, inter-connecting basements joined on the south and north by the grain and flour bins. There exists about 850,000 square feet of processing and warehouse space in the complex. The Site was first developed in 1929. Throughout the 1930s, additional buildings and other additions led to the current Site footprint. Portions of warehouse #9, warehouse #7, bakery mix building and the boiler room have been demolished. Most of the main buildings remain standing and include various pieces of equipment, elevators, and internal debris. Boilers, pipe runs and associate asbestos wrap was found throughout the remaining structures.

As noted above, the results of the scrapping and demolition activities previous left a large amount of loose and friable asbestos all through the buildings and asbestos containing rubble and debris outside of the buildings which is exposed to the elements.

**1.1.2.1 Location**
The Site is located on 1525 East Phillips Street at the intersection of East Phillips and North 15th Streets in Springfield, Sangamon County, Illinois, 62702. Residential properties are located immediately across the street from the facility on the north and east perimeters. Site coordinates are Latitude 39 48' 43.21" North and Longitude -89 38' 01.50" West. The Site is located in a mixed use area, including industrial, commercial, and residential areas. To the south and west are residential areas and to the east is railroad property. The Site is fenced along the west and south sides, and bounded by Illinois & Midland (I&M)/Tazewell & Peoria (T&P) Railroad spurs along the east. The capital building of the State of Illinois is approximately one mile to the southwest. Interstate Highway 55 is approximately 1.5 miles east of the Site. Over 11,000 people live within one mile of the Site. The nearest residences are located approximately 100 feet from the main entrance and the asbestos-containing debris piles near the former plant buildings.

**1.1.2.2 Description of Threat**
Asbestos was the principal contaminant of concern, which made this removal action a nationally significant and precedent setting removal. Also, small quantities of paint containers, totes of unknown chemicals, suspected fuel oils and containers of gasoline products, antifreeze, PCB lighting ballasts, mercury light bulbs and switches and other common household hazardous wastes were observed. The OSC documented the presence of friable asbestos, ACM, and regulated asbestos containing material (RACM) at the Site during a Site visit on May 17, 2016.

**1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**
On several occasions in August and September 2015, the Illinois EPA (IEPA) conducted inspections of the Site

and collected samples of ACM-impacted building materials. Most notably these samples came from debris piles strewn about inside and outside the buildings (warehouse #6) and from pipe insulation found on the floor in the buildings (warehouse #4, Grocery Mix building and warehouse #6). The IEPA lab sample results concluded that ACM was present inside and outside the buildings and co-mingled with debris piles.

The August 2015 inspection collected samples showed 15 of 17 bulk sample locations contained 2%-70% chrysotile and 5%-40% amosite asbestos, including friable asbestos. A September 2015 sample result showed that asbestos was outside the buildings on the ground near the main entrance to the facility (Grocery Mix building).

On June 2, 2016, EPA and IEPA met on-site for a Site evaluation and to review the asbestos analytical data. All samples were analyzed using Polarized Light Microscopy (PLM) and were considered positive for asbestos if the sample had asbestos greater than 1 percent weight by volume. During the EPA removal site evaluation, the property showed evidence of trespassing in the form of graffiti and apparent illegal scrapping. Asbestos debris was observed on the surface of the Site, with limited restricted access.

In August 2016, IEPA took additional asbestos samples demonstrating that Transite found outside warehouse #7 and the Bakery Mix Tower building (near the fence) had been released to the environment.

EPA conducted assessment categorization of suspected ACM at the Site in accordance with the NESHAPS at 40 CFR, Parts 61.141 and 61.145. The ACM data was classified under one of the three categories summarized as follows:

- Category I Non-Friable ACM is defined as ACM packing, gaskets, resilient floor covering, and asphalt roofing products containing more than 1-percent asbestos. Generally, Category I building materials would not create an airborne release of asbestos fibers during normal demolition activities. However, the debris at the Site is the result of improper demolition, thereby creating Regulated ACM (see below).

- Category II Non-Friable ACM is defined as any material, excluding Category I non- friable ACM, containing more than 1-percent asbestos that, when dry, cannot be crumbled, pulverized, or reduced to a powder by hand pressure. An example of this ACM is asbestos cement board. Generally, Category II building materials would create an airborne release of asbestos fibers during normal demolition activities.

- Regulated ACM (RACM) is defined as (1) friable ACM; (2) Category I Non-Friable ACM that has become friable; (3) Category I Non-Friable ACM that will be or has been subjected to sanding, grinding, cutting, or abrading; or (4) Category II Non-Friable ACM that has a high probability of becoming or has become crumbled, pulverized, or reduced to powder by forces expected to act on the material in the course of demolition or renovation operations regulated under Subpart 61.141 of 40 CFR, Part 61 (NESHAP Revision; Final Rule).

In addition to the Illinois EPA asbestos data, past owners and operators of the Site had conducted asbestos surveys. Prior owners documented that asbestos was found throughout the facility. For example, a December 1996 report produced by Cargill documented friable asbestos containing material, including pipe insulation, fitting insulation, tank insulation, and dryer insulation. The report identified areas where friable asbestos was found and quantified the amount: i.e. C. Mill — 1st floor, pipe insulation — 1,200 linear feet; 2nd floor, pipe insulation —350 linear feet; 8180 Building — 3rd floor, pipe insulation — 3,500 linear feet; 5th floor, pipe insulation — 550 linear feet, etc. The data provided in this report showed that chrysotile ranged from 5%-15% and amosite ranged from 10% - 20%. In a May 2008 report, Ley Properties, LLC (the then-owner of the Site), in an effort to scrap valuable electrical equipment documented that asbestos was found in basement electrical vaults under warehouse #7. Their results showed Chrysotile ranged between 30% - 50%.

The documents referenced above confirmed that large amounts of asbestos was historically found at the Site, some in damaged condition. Due to uncontrolled scrapping and demolition activities at the Site, EPA cannot correlate these reports to current Site conditions. However, the conditions demonstrated that the asbestos was released to the environment.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

The removal action mitigated the threats from asbestos by locating, sampling, and arranging for disposal of asbestos and asbestos debris left at the Site. The uncontrolled conditions of the hazardous substances at the Site require that agency effort be classified as a time-critical removal action. As expected, the overall project duration was ultimately driven by the vast size of the former facility. Additionally, many of the various building basements held water and because of such required extensive amount of time to pump remove the water for access and asbestos removal.

### 2.1.2 Response Actions to Date

The OSC tasked the ERRS (ER, LLC) and START (Tetra Tech) contractors to perform the following actions with important project benchmarks of:

- Develop and implement a Removal Action Work Plan (RAWP);
- Develop and implement an Emergency Contingency Plan (ECP);
- Develop and implement a Site Health & Safety Plan (HASP) consistent with the work to be performed, but not limited to an air monitoring plan that address asbestos removal and friable asbestos containing materials (ACM) during the removal of asbestos, scrap steel and other PACM demolition debris on the site;
- Develop and implemented an Air Monitoring Plan (AMP);
- As related to the AMP, START has developed and implemented a perimeter air monitoring system with real-time dust particulate monitoring (DustTrak) using the Emergency Response Team VIPER System;
- As related to the AMP, START initiated the weekly collection of asbestos air sampling activities on February 8, 2017, using high-volume pumps (AirCon2) calibrated in conjunction with samples cassettes that are sent to a laboratory for potential asbestos fiber releases. Four air monitoring stations have been strategically placed both near the site and in close proximity to nearby residential homes;
- On February 6, 2017, the ERRS contractor arranged for electrical and water service be provided to support project needs inside the temporary field office and decontamination station. That same day a fire hose was used to clean an existing concrete parking area on the south side of the site for a Command Post;
- The ERRS contractor routinely use fire hoses connected to a metered fire hydrant for wetting and misting of ACM impacted materials and PACM construction debris;
- The contractors placed clean rock next to the loading pad to facilitate ingress/egress of trucks that haul ACM and PACM demolition debris;
- On February 15, 2017, the ERRS contractor initiated the loading, transportation and disposal of PACM demolition debris materials;
- On February 21, 2017, the ERRS contactor initiated the repackaging of bagged asbestos pipe insulation materials that was illegally removed by others;
- On March 10, 2017, the ERRS contractor completed the loading, transportation and disposal of PACM demolition debris;
- The asbestos removal work was temporarily shut-down during the entire week of March 13, 2017, for OSC training in Angola, Indiana;
- EPA, START and ERRS contractors returned to work on March 20, 2017. Due to an increase in the number of asbestos removal workers, a larger crew shower trailer and diesel powered generator was delivered that same week;
- On March 21, 2017, ERRS assembled and affixed a debris chute onto the 4$^{th}$ floor of the Series “A” Bakery Mix Tower Building;
- On March 22, 2017, ERRS initiated asbestos glove-bag removal on the 8$^{th}$ floor of the Series “A” Bakery Mix Tower Building
- On March 23, 2017, ERRS completed the pre-cleaning along with the completion of the negative-air containment system on the 4$^{th}$ floor of Series “A” Bakery Mix Tower Building
- On March 23, 2017, ERRS initiated asbestos removal work on the 7$^{th}$ and 4$^{th}$ floor of the Series “A” Bakery Mix Tower Building.
- On March 23, 2017, ERRS completed glove-bag asbestos removal work on the 8$^{th}$ floor of the Series “A” Bakery Mix Tower Building.
- On March 24, 2017, ERRS completed glove-bag asbestos removal work on the 7$^{th}$ floor of the Series “A” Bakery Mix Tower Building.
- On March 29, 2017, ERRS completed glove-bag asbestos removal work on the 6$^{th}$ floor of the Series “A” Bakery Mix Tower Building.
- On April 4, 2017, ERRS completed glove-bag asbestos removal work on the 5$^{th}$ floor of the Series “A” Bakery Mix Tower Building.

- On April 10, 2017, ERRS completed negative air containment asbestos removal work on the 4th floor of the Series “A” Bakery Mix Tower Building.
- On April 14, 2017, ERRS completed glove-bag asbestos removal work on the 3rd floor of the Series “A” Bakery Mix Tower Building.
- On April 17, 2017, ERRS completed glove-bag asbestos removal work on the 2nd floor of the Series “A” Bakery Mix Tower Building.
- On April 20, 2017, ERRS and START collected representative samples of presumed rain-water from the basement of the Series “A” Bakery Mix Tower Building. The sample results were submitted to the IEPA on May 15, 2017, for approval to discharge into the Springfield, Illinois, storm-water sewers.
- On April 25, 2017, the OSC tasked ERRS to rent equipment and cut the grass areas of the former Pillsbury Mills facility.
- Asbestos removal was completed on April 26, 2017, in the area just outside of Series “A” Warehouse #7.
- On April 28, 2017, ERRS completed removal work on the main floor of Warehouse #7 and #8 along with the Series “A” Bakery Mix and Bakery Mix Tower Series “A” Building(s).
- On May 1, 2017, ERRS initiated asbestos removal work on the Main Floor of Series “B” Building of “C” Mill/Warehouse #6, including the Main Floor only of all Series “B”; also, initiated removal work in Series C of the A&B Mill/Warehouse #2.
- On May 1, 2017, ERRS received the laboratory results of the representative water samples collected from the basement of the Series “A” Bakery Mix Tower Building. The OSC submitted the lab results with the Manager, Industrial Unit of Water Pollutions Permits at the Illinois EPA.
- On May 11, 2017, ERRS completed the asbestos removal work on both the Series “B” Building 1st and 2nd Floor of Locker Rooms.
- On May 17, 2017, ERRS completed the asbestos removal on the 5th Floor of the Series “B” Grocery Mix Warehouse #3 Building.
- On May 30, 2017, ERRS completed the asbestos removal on the 4th Floor of the Series “B” Grocery Mix of Warehouse #3 Building.
- On June 2, 2017, ERRS completed the asbestos removal on the 2nd and 3rd floor of the Series “B” Grocery Mix Building.
- On June 2, 2017, ERRS initiated asbestos removal work on the 2nd and 3rd floors of Series “B” C Mill, Warehouse #6 Building.
- On June 8, 2017 ERRS began transferring basement water from one basement to another.
- On June 12, 2017, ERRS completed the asbestos removal on the 2nd floor of C Mill, Warehouse #6 Series “B” Building.
- On June 16, 2017, ERRS completed the asbestos removal on the 3rd floor of C Mill, Warehouse #6 Series “B” Building.
- On June 20, 2017, ERRS completed the asbestos removal on the 4th floor of C Mill, Warehouse #6 Series “B” Building.
- On June 21, 2017, ERRS completed the asbestos removal on the 5th floor of C Mill, Warehouse #6 Series “B” Building.
- On June 22, 2017, ERRS completed the asbestos removal on the 6th, 7th, and 8th floors of C Mill, Warehouse #6 Series “B” Building.
- On June 23, 2017, ERRS completed the asbestos removal on the 9th floor of C Mill, Warehouse #6 Series “B” Building.
- On June 28, 2017, ERRS completed the asbestos removal from the C Mill, Warehouse #6 Series “B” Building basement.
- The OSC elected to suspend all site work for the entire week of the July 4, 2017 Holiday (June 29 – July 10, 2017).
- On July 13, 2017, ERRS completed the asbestos removal from the A/B Mill, Warehouse #2 Series “C” Building basement.
- On July 19, 2017, ERRS completed the asbestos removal from the 2nd floor of the Series “C” A/B Mill, Warehouse #2 including the Turbo Building and Bulk Storage Building.
- On July 20, 2017, ERRS completed the asbestos removal from the 4th floor of Series “C” A/B Mill, Warehouse #2 Building.

- On July 21, 2017, ERRS completed the asbestos removal from the 5th floor of Series “C” A/B Mill Warehouse #2 Building.
- On July 24, 2017, ERRS completed the asbestos removal from the 6th floor of Series “C” A/B Mill Warehouse #2 Building.
- On July 25, 2017, ERRS completed the asbestos removal from the 7th floor of Series “C” A/B Mill Warehouse #2 Building.
- On July 27, 2017, ERRS completed the asbestos removal from the 8th and 9th floor of Series “C” A/B Mill Warehouse #2 Building.
- On July 29, 2017, ERRS completed the asbestos removal from the 3rd floor of Series “C” A/B Mill Warehouse #2 Building.
- On August 15, 2017, START initiated Hazard Characterization (Haz-Cat) identification of unknown containers that were filled or partially containing unknown chemical contents.
- During the period of August 15, 2017 through September 15, 2017, START and ERRS contractors either emptied, consolidated, bulked or solidified a total of 622 containers containing mostly lubricating oils along with a multitude of unknown chemicals that were Haz-Cat hazard class identified and then co-mingled by like hazard classes into the appropriate bulked containers for safe temporary storage and ultimate off-site transportation and disposal.
- On August 29, 2017, and after an extensive time frame that required pumping of accumulated rain water from the basement, ERRS completed the asbestos removal from the entire basement of all the Series “B” Buildings.
- On August 31, 2017, and after an extensive time frame that required pumping of accumulated rainwater from the basements, ERRS completed the asbestos removal from the basement of the Series “C”, Head House Building.
- On September 5, 2017, ERRS completed the asbestos removal from the Series “C” 2nd floor of A/B Mill Warehouse #2 Building.
- On September 7, 2017, from prior arrangements made by the OSC, five compressed gas cylinders belonging to Linde Gas LLC was removed, transported for evacuation and disposal at the Linde Air Company facility located at 1351 West Jefferson Street in Springfield, Illinois.
- On September 14, 2017, ERRS completed the asbestos removal from the Forklift Room Out-Building.
- On September 20, 2017, the OSC met with a representative of IEPA to turn both site security and jurisdictional site control back to IEPA.
- On September 21, 2017, ERRS completed demobilization of the last pieces of equipment and supplies from the site.
- On September 22, 2017, the OSC met on-site with representatives of Republic Services to sign the required shipping documents and remove from secured storage universal hazardous waste materials.
- On September 20, 2017, a local Springfield Illinois company, Getz Fire Equipment, LLC, picked up 158 pounds of Halon powder for delivery to their Peoria, Illinois facility for beneficial reuse.
- On September 29, 2017, from prior arrangements made by the OSC, one pallet of non-hazardous, commercial grade laundry bleach belonging to ECOLAB was removed, transported by Bodine Environmental to Tradebe Environmental Services for solidification at their facility located at 4343 Kennedy Avenue in East Chicago, Indiana, and ultimately land applied disposed at the WMI Laraway RDF in Peoria, Illinois.
- On November 1, 2017, the OSC and two ERRS technician returned to the site for the removal of the remaining hazardous waste materials securely stored within Dock #107. Representatives from Veolia Environmental Services arrived on site to safely package, handle, ship and transport for off-site disposition.

**2.1.3 Enforcement Activities, Identity of Respondent (RP)/Potentially Responsible Parties (PRPs)**

Enforcement actions are pending at this time.

**2.1.4 Progress Metrics**

USEPA and its contractors demobilized from the site on September 21, 2017 and turned site security and jurisdictional control back to IEPA.

The following summary indicates off-site disposal of the various waste streams removed from the site. They are:

| **Waste Name** | **# of Loads** | **Quantity** | **Treatment** | **Location** |
|---|---|---|---|---|
| ACM/PACM/RACM Impacted Debris | 100 | 2195.90 tons | Land Disposal | Waste Management, Inc., Five Oaks Landfill Taylorville, IL |
| ACM Pipe Wrap and Boiler Insulation (TSI) | 29 (40 cubic-yard roll-off-boxes) | 1160 cubic yards | Land Disposal | Republic Services Sangamon Valley Landfill, Springfield, IL |
| Non asbestos C & D debris | 22 (end-dump trailers) | 186.92 tons | Land Disposal | Republic Services Sangamon Valley Landfill, Springfield, IL |
| Commercial Strength Powdered Bleach/Soap | 1 | 1 pallet+ | Land Applied | ECOLAB Brokered to Tradebe Enviro. Svs. East Chicago, IN |
| **Compressed Gas Cylinders - Wastes** | **# of Loads** | **Quantity** | **Treatment** | **Location** |
| Oxygen | 1 | 1 cylinder | Recycle | ILMO Products Company 2070 Peoria St. Springfield, IL |
| Acetylene | 1 | 3 cylinders | Recycle | ILMO Products Company 2070 Peoria St. Springfield, IL |
| Chlorine | 1 | 2 cylinders | Reclaim | Jones Chemicals, Inc. 600 Bethel Avenue Indianapolis, Indiana |
| Halon | 1 | 158 pounds | Recycle | Getz Fire Equipment Co., Peoria, Illinois |
| **Universal Wastes** | **# of Loads** | **Quantity** | **Treatment** | **Location** |
| 5-Foot and above Fluorescent Light Bulbs | 1 | 2383 | Recycle | Information pending from Republic Services |
| 4-Foot and under Fluorescent Light Bulbs | 1 | 3159 | Recycle | Information pending from Republic Services |
| U-Tube Compact/Circular Lamp Bulbs | 1 | 10 | Recycle | Information pending from Republic Services |
| PCB light ballast | 1 | 4740 pounds | Land Dispose | Information pending from Republic Services |
| Automotive lead acid and sealed batteries | 1 | 141 pounds | Recycle | Information pending from Republic Services |
| **Lab Pack Wastes** | **# of Loads** | **Quantity** | **Treatment** | **Location** |
| Compressed Gases Acetylene, Anhydrous ammonia, CO2,Nitrogen, Helium | 1 | 8 cylinders | Incineration | Veolia Enviro. Svs. 7 Mobile Avenue Sauget, Illinois |
| Ignitable, Reactive, Corrosive (liquids and solids) | 1 | 8 boxes | Incineration | Veolia Enviro. Svs. 7 Mobile Avenue Sauget, Illinois |
| Used oils, Waste Anti-freeze | 1 | 7, 275-gal. totes, 1, 55-gal. drum | Fuels Blend oil<br>Recycle Anti-freeze | Veolia Enviro. Svs. 124 Boundary Road Menomonee Falls, WI |
| Acids | 1 | 1, Fiber Box | Treat, | Veolia Enviro. Svs. 24 Boundary Road |

| | | | | |
|---|---|---|---|---|
| | | | Land apply | Menomonee Falls, WI |
| Elemental Mercury | 1 | 1, 5-gal. bucket | Retort Reclaim | Veolia Enviro. Svs.<br>24 Boundary Road<br>Menomonee Falls, WI |
| Aerosol ca | 1 | 3, Fiber Box | Evacuate, Land apply | Veolia Enviro. Svs.<br>24 Boundary Road<br>Menomonee Falls, WI |
| **EPA/ERRS/START Recyclables** | **# of Loads** | **Quantity** | **Treatment** | **Location** |
| Single-Stream Paper/Plastic/Aluminum Etc. | 15 | 22.5 cubic yards | Sort and Recycle | Waste Management, Inc., transfer/consolidated/delivered to Midwest Fiber in Bloomington, IL |

| | | |
|---|---|---|
| This is an Integrated River Assessment. The numbers should overlap. | Miles of river systems cleaned and/or restored | NA |
| | Cubic yards of contaminated sediments removed and/or capped | NA |
| | Gallons of oil/water recovered | NA |
| | Acres of soil/sediment cleaned up in floodplains and riverbanks | NA |
| Stand Alone Assessment | Number of contaminated residential yards cleaned up | NA |
| | Number of workers on site | 0 |
| Contaminant(s) of Concern | Damaged and Friable Asbestos | |
| ***Oil Response Tracking*** | | |
| Estimated volume | Initial amount released | |
| | Final amount collected | |
| CANAPS Info | FPN Ceiling Amount | |
| | FPN Number | |
| | Body of Water affected | |

| ***Administrative and Logistical Factors (Place X where applicable)*** | | | | | |
|---|---|---|---|---|---|
| X | Precedent-Setting HQ Consultations (e.g., fracking, asbestos) | X | Community challenges or high involvement | | Radiological |
| | More than one PRP | | Endangered Species Act / Essential Fish Habitat issues | | Explosives |
| | AOC | | Historic preservation issues | | Residential impacts |
| | UAO | | NPL site | | Relocation |
| | DOJ involved | | Remote location | | Drinking water impacted |
| X | Criminal Charges Have Been Filed | X | Extreme weather or abnormal field season | | Environmental justice |
| | Tribal consultation or coordination or other issues | X | Congressional involvement | X | High media interest |
| | Statutory Exemption for $2 Million | | Statutory Exemption for 1 Year | | Active fire present |
| X | Hazmat Entry Conducted – Level A, B or C | | Incident or Unified Command established | X | Actual air release (not threatened) |

| *Green Metrics* | | |
|---|---|---|
| **Metric** | **Amount** | **Units** |
| Diesel Fuel Used | 4194 | gallons |
| Unleaded Fuel Used | 3186.52 | gallons |
| Alternative/E-85 Fuel Used | NA | gallons |
| Electricity from electric company | 5600 | kWh |
| Electric Company Name and Account # | City Water Light and Power 00277913-816434223 | |
| Electricity from sources other than the electric company | 2146.6 | kWh |
| Solid waste reused | 0 | |
| Solid waste recycled | 22.5 | cubic yards |
| Water Used | 252,200 | gallons |
| **Removal program received this infomation from CID*<br>*Version 160317* | | |

**2.2 Planning Section**

**2.2.1 Anticipated Activities**

All site work has been completed.

**2.2.1.1 Planned Response Activities**

No additional response actions are planned as site work is completed.

**2.2.1.2 Next Steps**

No additional response actions are planned as site work is completed.

**2.2 Issues**

Due to structural safety concerns created from many years of water damage, the 4th, 5th, 6th, 7th, 8th and 9th floors on the west side of the Series “B,” “C” Mill Building, could not be safely accessed for asbestos removal by EPA contractors.

**2.3 Logistics Section**

Not applicable (NA)

**2.4 Finance Section**

**2.4.1 Narrative**

A TDD for $35,000 was issued to Tetra Tech Inc., on 1/10/2017.
TDD Amendment #1 for $35,000 was approved by the OSC on 2/17/2017.
TDD Amendment #2 for $35,000 was approved by the OSC on 4/13/2017.
TDD Amendment #3 for $22,000.00 was approved by the OSC on June 1, 2017.
TDD Amendment #4 for $35,000.00 was approved by the OSC on July 17, 2017.
The START project budget is: $162,000.00.
As of 12/4/2017, START costs to date are $148,046.22.

A Task Order (TO) for $300,000 was issued to Environmental Restoration, LLC, on January 11, 2017.
A TO amendment for $100,000 was issued on January 31, 2017.
A TO amendment for $300,000 was issued on February 27, 2017.
A TO amendment for $350,000 was issued on April 10, 2017.
A TO amendment for $150,000 was issued on May 27, 2017.
A TO amendment for $200,000 was issued on July 7, 2017.
A TO amendment for $200,000 was issued on July 26, 2017.
A TO amendment for $200,000 was issued on September 6, 2017.

ER, LLC cost to date are $1,588,432.00

### 2.5 Other Command Staff

#### 2.5.1 Safety Officer

All field work was conducted under an approved Health and Safety Plan (HASP). No additional response actions are planned as site work is completed.

### 2.6 Liaison Officer

NA

### 2.7 Information Officer

NA

#### 2.7.1 Public Information Officer

NA

#### 2.7.2 Community Involvement Coordinator

NA

## 3. Participating Entities

### 3.1 Unified Command

NA

### 3.2 Cooperating Agencies

Illinois EPA

## 4. Personnel On Site

None on-site as site work is completed.

## 5. Definition of Terms

| | |
|---|---|
| ACM(s) | Asbestos Containing Materials |
| ACWM | Asbestos Containing Waste Materials |
| AMP | Air Monitoring Plan |
| BTEX | Benzene, toluene, ethyl benzene, xylenes |
| ECP | Emergency Contingency Plan |
| EPA | Environmental Protection Agency |
| ER, LLC | Environmental Restoration, LLC |
| ERRS | Emergency and Rapid Response Services |
| FPN | Federal Project Number |
| HASP | Health and Safety Plan |
| Haz-Cat | Hazardous Categorization |
| IEPA | Illinois Environmental Protection Agency |
| NA | Not Applicable |
| NESHAPS | National Emission Standards for Hazardous Air Pollution (asbestos) |
| NPDES | National Pollution Discharge Elimination System |
| OSC | On-Scene Coordinator |
| PACM | Presumed Asbestos Containing Materials |
| PCBs | Polychlorinated Biphenyls |
| PCM | Phase Contrast Microscopy |
| PLM | Polarized Light Microscopy |

| | |
|---|---|
| POLREP | Pollution Report |
| PRP | Potentially Responsible Party |
| RP | Respondent |
| RACM | Regulated Asbestos Contaminated Materials |
| RAWP | Removal Action Work Plan |
| SITREP | Situation Report |
| START | Superfund Technical Assessment and Response Team (Tetra Tech) |
| TDD | Technical Directive Document |
| TEM | Transmission Electron Microscopy |
| TO | Task Order |
| TSI | Thermal System Insulation(s) |
| UST | Underground Storage Tank |
| USEPA | United States Environmental Protection Agency |

## 6. Additional sources of information

### 6.1 Internet location of additional information/report

Additional information can be found at

### 6.2 Reporting Schedule

NA

## 7. Situational Reference Materials

NA